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**BY ECF**

Hon. Colleen McMahon  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *People of the State of New York v. City of New York, et al.* SDNY No. 20-cv-8924 (CM)(GWG) (consolidated actions); this letter relates to *Gray v. City of New York*, 21-cv-6610 (CM)(GWG), and *Rolon v. City of New York*, 21-cv-02548 (CM) (GWG)

Dear Judge McMahon:

We are counsel to the Police Benevolent Association (“PBA”). We write regarding two stipulations/proposed orders we have efiled regarding the PBA’s motion to intervene into two of the Consolidated Actions, *Gray v. City of New York*, 21-cv-6610 and *Rolon v. City of New York*, 21-cv-02548.

The PBA filed papers laying out the basis for intervention on July 29, 2022. (Nos. 704-706 on the Consolidated docket). Any papers in opposition to the PBA’s motions are due today.

As reflected by the two stipulations and proposed orders submitted herewith, plaintiffs have consented to the PBA’s intervention. Counsel to the City Defendants have authorized me to set out their position that “without waiving any of City Defendants’ previous objections, City Defendants believe that a fair reading of the courts’ decisions makes it reasonable for the unions to be able to intervene in the later consolidated cases seeking equitable relief, and [the City Defendants] therefore will not be submitting any opposition to the PBA’s current motion in either matter.” We therefore ask that the Court enter the two stipulations/proposed orders submitted herewith granting the PBA’s motion to intervene in *Gray* and *Rolon*.

Respectfully,



Thomas A. Kissane

Copies To:

All counsel in Consolidated Actions (via ECF).